

PROSKAUER ROSE LLP
Edward Cerasia II
Christie Del Rey-Cone
One Newark Center, 18th Floor
Newark, New Jersey 07102
973.274.3200 or 212.736.8185

Attorneys for Defendants
Ron Haskin, Valerie Jenkins and Linda Johnson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
JUAN CARLOS MEDINA,	:	
	:	
Plaintiff,	:	05-CV-6171 (JGK)
	:	
-against-	:	<u>NOTICE OF MOTION</u>
	:	
JETBLUE AIRWAYS CORPORATION, a/k/a	:	<u>Document Electronically Filed</u>
JETBLUE AIRWAYS, LINDA JOHNSON,	:	
VALERIE JENKINS, and RON HASKIN	:	
	:	
Defendants.	:	
-----	x	

To: Yetta G. Kurland, Esq.
Kurland & Associates, P.C.
304 Park Avenue South, Suite 206
New York, New York 10010

PLEASE TAKE NOTICE that defendants Ron Haskin, Valerie Jenkins and Linda Johnson (collectively, the "Individual Defendants"), by their undersigned counsel, Proskauer Rose LLP, shall move before the Honorable John G. Koetl, United States District Judge, at the United States Courthouse, 500 Pearl Street, Room 1030, New York, New York, at 10:00 a.m. on _____, 2005, or as soon thereafter as counsel may be heard, for an order (a) granting the Individual Defendants' Fed. R. Civ. P. 12(b)(6) motion to dismiss the Complaint in its entirety; (b) granting the Individual Defendants their costs, including attorneys' fees,

incurred in connection with this motion; and (c) granting to the Individual Defendants such other and further relief as the Court may deem just and proper.

Dated: Newark, New Jersey
August 30, 2005

Respectfully submitted,

PROSKAUER ROSE LLP

By s/ Edward Cerasia II
Edward Cerasia II
Christie Del Rey-Cone
One Newark Center, 18th Floor
Newark, New Jersey 07102
973.274.3200 or 212.736.8185

Attorneys for Defendants
Ron Haskin, Valerie Jenkins and Linda Johnson

CERTIFICATION OF SERVICE

I hereby certify that on August 30, 2005, I caused to be served a true and correct copy of the Defendants Ron Haskin's, Valerie Jenkins' and Linda Johnson's Notice of Motion To Dismiss the Complaint by ECF and U.S. regular mail, postage prepaid, on the following counsel of record for the plaintiff:

Yetta G. Kurland, Esq.
Kurland & Associates, P.C.
304 Park Avenue South, Suite 206
New York, New York 10010

s/Christie Del Rey-Cone

Christie Del Rey-Cone